



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

EAG/JDG/CMP
F.#2008R00530

271 Cadman Plaza East
Brooklyn, New York 11201

August 16, 2011

By Federal Express

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Re: United States v. Thomas Gioeli, et al.
Criminal Docket No. 08-240 (BMC)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes the following enclosed additional discovery in the above-captioned case. The government also renews its request for reciprocal discovery.

<u>EXHIBIT</u>	<u>DESCRIPTION</u>
1264	Compact disc ("CD") containing a backup file of the memory of the Sharp electronic organizer that belonged to William Cutolo, Sr. ("Cutolo electronic organizer")
1265	Data print out of the contents of the Cutolo electronic organizer
1266	CD containing recorded telephone calls placed by Dino Saracino between June 1, 2008 and July 17, 2008

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<u>EXHIBIT</u>	<u>DESCRIPTION</u>
1267	CD containing recorded telephone calls placed by Dino Saracino between July 16, 2008 and October 7, 2008
1267a	CD containing recorded telephone calls placed by Dino Saracino between October 6, 2008 and November 24, 2008
1268	CD containing recorded telephone calls placed by Dino Saracino between November 24, 2008 and January 9, 2009
1269	CD containing recorded telephone calls placed by Dino Saracino between January 15, 2009 and June 11, 2009
1270	CD containing recorded telephone calls placed by Dino Saracino between June 18, 2009 and November 14, 2009
1271	CD containing recorded telephone calls placed by Tommy Gioeli between June 6, 2008 and July 16, 2008
1272	CD containing recorded telephone calls placed by Tommy Gioeli between July 17, 2008 and October 6, 2008
1273	CD containing recorded telephone calls placed by Tommy Gioeli between October 6, 2008 and November 23, 2008
1274	CD containing recorded telephone calls placed by Tommy Gioeli between November 24, 2008 and January 8, 2009
1275	CD containing recorded telephone calls placed by Tommy Gioeli between January 15, 2009 and June 10, 2009
1276	CD containing recorded telephone calls placed by Tommy Gioeli between June 18, 2009 and December 14, 2009

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<u>EXHIBIT</u>	<u>DESCRIPTION</u>
1277	CD containing recorded telephone calls placed by Joel Cacace between May 3, 2008 and July 16, 2008
1278	CD containing recorded telephone calls placed by Joel Cacace between November 28, 2008 and December 5, 2008
1279	CD containing recorded telephone calls placed by Joel Cacace between December 6, 2008 and January 5, 2009 and between June 21, 2009 and December 14, 2009
1280	Omitted
1281	CD containing recorded telephone calls placed by Joel Cacace between January 15, 2009 and June 11, 2009
1282	Bureau of Prison inmate quarters history records for inmates Alphonse Persico and Joel Cacace
1283	N.Y.C. Department of Correction records for Joseph Competiello
1284	New York City Department of Probation records for Joseph Competiello

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If you have any questions or requests, please
contact us.

Sincerely,

LORETTA E. LYNCH
UNITED STATES ATTORNEY

By: /s/ Elizabeth A. Geddes
Elizabeth A. Geddes
James D. Gatta
Cristina M. Posa
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cc: Carl J. Herman, Esq. (by ECF) (w/o enclosures)
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David Stern, Esq. (by ECF) (w/o enclosures)
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Clerk of the Court (BMC) (by ECF) (w/o enclosures)